

Eileen Stommes, Deputy Director
USDA-AMS-TM-NOP
Docket #TMD-94-00-2, Room 4004-South
Ag Stop 0275, PO Box 96456
Washington DC 20090-6456

Dear Eileen Stommes,

I have recently become aware of the US Department of Agriculture's attempt to redefine standards for Organic foods. I certainly believe in having strong and healthy national standards for Organic foods. My ability to protect myself from hazardous substances in my food is my fundamental right as a citizen of the United States. This is why I am writing you. I strongly oppose the proposed revisions released by the USDA on 12/16/97 regarding the classification for Organics. I oppose this proposal precisely because it allows the very substances and processes that current California Organic standards ban.

When I buy Organic food, I buy it to *protect* myself from ingesting food that has been genetically engineered, irradiated, contains municipal sludge, antibiotics, or diseased and waste animal body parts. I spend extra money on Organic food because I have also been assured that it does not contain EPA-listed "potentially toxic" or "unknown toxicity" substances.

The proposed USDA definition for Organic destroys the safety standards, which protect me from *exactly* these things. The current "Organic" codes of 17 states, 33 private certifying agencies, and Europe's "biological" food label clearly restricts all of the above practices and considers them non-organic and non-biological. To use the USDA's proposed standards as the definition for Organic is blatantly misleading to the very people it claims to protect. If the USDA insists on including the above substances and procedures, it should use a *different term* to classify these foods.

The Proposed Rule removes my ability to control the substances that go into my body from the food I eat. With greatly escalating incidents of cancer and other illnesses in this country due to ingestion of pesticides and other pollutants – this USDA action takes away my right to obtain pure food. It is totally unacceptable for the USDA to impose such a thing on the citizens of the United States. It amounts to nothing less than forced contamination of its own people.

I urge the USDA to adhere to the requirements of the Organic Food Production Act and to model the federal Organic standards after California's stringent code. In addition, I oppose the new USDA rules that would deny states and localities from setting tougher Organic food standards without first being approved by the USDA. The necessity for creating such standards is not in question. But when the USDA prohibits farmers from *exceeding* these standards, it becomes obvious that corporate agribusinesses, chemical-biotech corporations and giant supermarket chains are being protected – not the citizens of the United States. I cannot support procedures which unfairly favor industrial factory farming over small family farms. The Proposed Rule changes the qualifying requirements and raises the costs of registering as an Organic producer, and will put hundreds of small farms and certifiers out of business.

Please follow the recommendations made by the National Organic Standards Board (NOSB) which is composed of industry representatives, farmers, environmentalists and food processors. They explicitly forbid genetically engineered foods, irradiation, farming with sewage sludge and intensive farms style animal husbandry practices. The National Organic Program Proposed Rule, as written, is an unlawful implementation of the Organic Foods Production Act of 1990. Rewrite the Rule.

Sincerely,